Wheeling & Pittsburgh

Duvall Center Wheeling, West Virginia 26003

June 3, 1983

Mr. Michael Moschell
Division of Hazardous Materials Management
OHIO ENVIRONMENTAL PROTECTION AGENCY
Southeast District Office
2195 Front Street
Logan, OH 43138

Re: WASTEWATER TREATMENT PLANT SLUDGES
MARTINS FERRY AND YORKVILLE PLANTS

Dear Mr. Moschell:

As you know, metallic hydroxide sludges are produced at our wastewater treatment facilities at our Martins Ferry and Yorkville Plants. In our initial implementation of the Federal Resource Conservation and Recovery Act (RCRA), these sludges were considered to be "hazardous wastes." However, in reviewing our hazardous waste management program, it appears that we misclassified these sludges.

Initially, they were considered to be a "hazardous waste" because they were derived from a hazardous waste and could contain chromium. While these sludges are derived from hazardous wastes, including corrosive chromium-bearing wastewaters, recent testing has shown them to be nonhazardous based on the characteristics included in the EP Toxicity Procedure. The results of these recent tests are given in the attached tabulation.

A point of some concern has been the matter of whether or not these sludges are derived from a waste listed in Subpart D of Part 261 of the USEPA regulations; namely, pickle liquor. As you know, a waste derived from a listed waste would require us to go through the complex maze of officially petitioning for exemption of these wastes.

At the Martins Ferry Plant, our process involves acid cleaning rather than pickling. The purpose of this step is to remove light surface rust from steel that has been pickled prior to its delivery to Martins Ferry. Thus, steel processed at Martins Ferry is free of the scale and heavy oxides which require conventional pickling. Using this thought process, we have decided that the spent acidic cleaning solution, while a hazardous waste because it is corrosive, falls outside the conventional definition of a spent pickle liquor and our sludge is, therefore, not derived from a listed hazardous waste.

On the other hand, conventional pickling is practiced at the Yorkville Plant, but the pickle liquor is kept segregated from other wastes and is shipped

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WASTEWATER TREATMENT PLANT SLUDGES MARTINS FERRY AND YORKVILLE PLANTS

outside of the plant for treatment and disposal. The wastewater treatment plant from which the sludge in question is produced processes pickle rinse and other wastewaters. While some of these wastewaters are "hazardous wastes", none are "listed hazardous wastes."

Based on the above analysis, we do not believe that it is necessary to petition to have these wastes delisted. We do, however, request your advice as to any official notification that may be required regarding our decision to reclassify these sludges as nonhazardous wastes.

These sludges are currently disposed of in Pennsylvania as hazardous wastes. Obviously, we must review any change in status of these wastes with our contractor before modifying any procedures. I will be notifying them of the above decisions. Hopefully, the conversion to the transporting and disposing of these sludges as nonhazardous wastes can be made promptly.

Any thoughts or comments you might have on this would be greatly appreciated.

Very truly yours,

Il. (Xapen

WHEELING-PITTSBURGH STEEL CORPORATION

W. R. Samples

Manager

Environmental Control

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